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Judge

*Counsel for Defendant Trans Union, LLC*

**UNITED STATES DISTRICT COURT  
 WESTERN DISTRICT OF WASHINGTON (SEATTLE)**

JERRI & LEE RICHARDSON,  
 Plaintiffs,

CASE NO.

vs.

PLANET HOME LENDING, LLC, a  
 Delaware Corporation; TRANS UNION LLC,  
 a Delaware Limited Liability Company;  
 EXPERIAN INFORMATION SOLUTIONS,  
 INC., an Ohio Corporation; and EQUIFAX  
 INFORMATION SERVICES LLC, a Georgia  
 Limited Liability Company;  
 Defendants.

**TRANS UNION, LLC’S NOTICE OF  
 REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the Snohomish County Superior Court, State of Washington to the United States District Court for the Western District of Washington (Seattle), on the following grounds:

1. Plaintiffs Jerri and Lee Richardson served Trans Union on or about September 30, 2021, with a Summons and Complaint, to be filed in the Snohomish County Superior Court, State

**TRANS UNION, LLC’S NOTICE OF REMOVAL**  
 - 1  
 (CASE NO.)  
 {13288/115/02660821-2}

**MONTGOMERY PURDUE PLLC**  
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1 of Washington. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and  
 2 **Exhibit B**.

3 2. In the Complaint, Plaintiffs make claims against Trans Union under the Fair Credit  
 4 Reporting Act, 15 U.S.C. § 1681 *et seq.* (the “FCRA”). *See* Complaint ¶¶ 1.1, 2.2, 2.6-2.8, 3.2,  
 5 5.1-6.6.

6 3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C.  
 7 § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus  
 8 supplies this federal question.

9 4. Pursuant to 28 U.S.C. § 1441, *et seq.*, this cause may be removed from the Snohomish  
 10 County Superior Court, State of Washington to the United States District Court for the Western  
 11 District of Washington.

12 5. Counsel for Trans Union has contacted counsel and/or corporate representatives for  
 13 the Defendants Equifax Information Services, LLC (“Equifax”), and Experian Information  
 14 Solutions, Inc. (“Experian”). Equifax and Experian have consented to this removal as evidenced  
 15 by the consents attached hereto as **Exhibit C** and **Exhibit D**, respectively. Counsel for Trans  
 16 Union has also made exhaustive efforts to contact counsel and/or a corporate representative for  
 17 Defendant Planet Home Lending, LLC and, at this time, Trans Union has no indication that  
 18 Planet Home Lending, LLC has been served.

19 6. Notice of this removal will promptly be filed with the Snohomish County Superior  
 20 Court, State of Washington if the action is filed and served upon all adverse parties.

21 WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from  
 22 the Snohomish County Superior Court, State of Washington to this United States District Court,  
 23 Western District of Washington.

24 **TRANS UNION, LLC’S NOTICE OF REMOVAL**  
 25 **- 2**  
 26 **(CASE NO.)**  
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Respectfully submitted,

MONTGOMERY PURDUE PLLC

s/ Benjamin I. VandenBerghe

Benjamin I. VandenBerghe

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*Counsel for Defendant Trans Union, LLC*

Respectfully submitted,

MONTGOMERY PURDUE PLLC

s/ Christopher M. Reed

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*Counsel for Defendant Trans Union, LLC*

TRANS UNION, LLC'S NOTICE OF REMOVAL

- 3

(CASE NO.)

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **19th day of October, 2021**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

<b><u>for Plaintiffs Jerri and Lee Richardson</u></b> SaraEllen Hutchison, Esq. Law Office of SaraEllen Hutchison, PLLC 539 Broadway Tacoma, WA 98402	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **19th day of October, 2021**, properly addressed as follows:

<b><u>for Plaintiffs Jerri and Lee Richardson</u></b> SaraEllen Hutchison, Esq. Law Office of SaraEllen Hutchison, PLLC 539 Broadway Tacoma, WA 98402	
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*s/ Christopher M. Reed*

Christopher M. Reed, Esq.  
 WA State Bar No. 49716

*Counsel for Defendant Trans Union, LLC*